

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

SEAN STEWART and ROBERT STEWART,

Defendants.

S1 15 Cr. 287 (LTS)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Tai H. Park, Esq. dated September 18, 2015, the exhibits thereto, the accompanying Memorandum of Law, and all prior papers and proceedings in this action, defendant Sean Stewart, by his undersigned attorneys, will move this Court before the Honorable Laura Taylor Swain, at the United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order (a) dismissing the indictment as to Sean Stewart, pursuant to Fed. R. Crim. P. 12(b); (b) in the alternative, compelling the government, pursuant to Fed. R. Crim. P. 7(f), to provide a bill of particulars, and (c) awarding Sean Stewart such other and future relief as the Court deems just and proper.

Dated: New York, New York  
September 18, 2015

Respectfully submitted,

PARK JENSEN BENNETT LLP

By:   
\_\_\_\_\_  
Tai H. Park  
Kathleen E. Gardner  
Tami Stark

40 Wall Street, 41<sup>st</sup> Floor  
New York, New York 10005  
Tel: 646-200-6300  
Fax: 646-200-6301  
[tpark@parkjensen.com](mailto:tpark@parkjensen.com)

*Attorneys for Defendant Sean Stewart*